

Morgan Lewis

Christopher A. Parlo
Partner
+1.212.309.6062
chris.parlo@morganlewis.com

April 18, 2022

Via ECF

The Honorable United States District Judge Philip M. Halpern
United States District Court, Southern District of New York
500 Pearl Street, Room 1950
New York, NY 10007

Application granted. The Court deems the letter motions at ECF 76 and 107 to be withdrawn without prejudice to re-filing should the parties fail to reach a settlement. The parties are directed to file a status letter with the Court no later than May 27, 2022 on their efforts to privately resolve this matter.

The Clerk of Court is respectfully directed to terminate the motion sequence at ECF 122.

SO ORDERED.



Philip M. Halpern
United States District Judge

Dated: White Plains, New York
April 19, 2022

Re: Ramirez v. Marriott International, Inc., et al., 20-cv-02397-PMH-PED

Dear Judge Halpern:

The parties write jointly, pursuant to Rule 1.C. of your Honor's Individual Practices, to respectfully request an adjournment *sine die* of the April 21, 2022 telephonic pre-motion conference regarding Plaintiff's anticipated Motion for Conditional Certification and Defendants' anticipated Motion for Summary Judgment.

Defendants have provided Plaintiff's counsel certain requested data for the putative class, and since then the parties have been actively exploring the possibility of a private resolution. The parties hope to be able to resolve this case without the additional expense and resources associated with briefing the two above-referenced motions. Additionally, pursuant to the Court's March 30, 2022 order (ECF No. 103), the parties have met with the Court-appointed Mediator and scheduled a Zoom mediation for May 23, 2022. 4/15/2022 ECF Docket Entry. If the parties are not able to reach a resolution following mediation, we shall promptly inform the Court no later than May 27, 2022 and request a pre-motion conference concerning the aforementioned motions be scheduled at the Court's convenience.

This is the parties' first joint request for an adjournment of the April 21, 2022 pre-motion conference. The parties had previously sought and received an adjournment of the February 22, 2022 pre-motion conference concerning Plaintiff's anticipated Motion for Conditional

Certification to coincide with the pre-motion conference on Defendants' anticipated Summary Judgment Motion that had been scheduled for April 21, 2022. ECF Nos. 110 and 111. No other deadlines will be affected should the parties' request be granted.

Thank you for your consideration.

Respectfully submitted,

/s/ Christopher A. Parlo

Christopher A. Parlo
Attorney for Defendants

cc: All Counsel of Record (via ECF)